

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICROSOFT CORPORATION, a Washington
corporation,

Plaintiff,

v.

MOTOROLA, INC., and MOTOROLA
MOBILITY, INC., and GENERAL
INSTRUMENT CORPORATION,

Defendants.

MOTOROLA MOBILITY, INC., and
GENERAL INSTRUMENT CORPORATION,

Plaintiffs/Counterclaim Defendant,

v.

MICROSOFT CORPORATION,

Defendant/Counterclaim Plaintiff.

CASE NO. C10-1823-JLR

DEFENDANTS' NONOPPOSITION TO
MICROSOFT'S 6/15/12 MOTION TO
FILE DOCUMENTS UNDER SEAL

**NOTED ON MOTION CALENDAR:
Friday, June 29, 2012**

DEFENDANTS' NONOPPOSITION TO MICROSOFT'S
6/15/12 MOTION TO FILE DOCUMENTS UNDER SEAL
CASE NO. C10-1823-JLR

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Defendants do not oppose Microsoft's 06/15/12 Motion to Seal (ECF No. 342) regarding Exhibit 1 to Chris Wion's June 15, 2012 letter to the Court requesting leave to supplement the record, in support of Microsoft's Motion for Partial Summary Judgment Dismissing Motorola's Claim for Injunctive Relief (ECF No. 141). Exhibit 1 to Chris Wion's June 15, 2012 letter to the Court consists of a letter sent by counsel to Microsoft to counsel for Google, Inc., on June 15, 2012 (the "Cramer Letter") and (attached to that letter as Exhibit A) a confidential license agreement between Google (Motorola Mobility, Inc. and General Instrument Corp.'s parent company) and MPEG LA, L.L.C., a non-party to this litigation. MPEG LA has designated this license agreement as containing confidential information under the terms of the Protective Order entered on July 21, 2011 (ECF No. 72). Disclosure of this information to third parties and other party employees not covered by the Protective Order would have the potential to lead to competitive harm. Due to presence of this highly confidential information throughout the license, and the Cramer Letter's repeated references to the license, Exhibit 1 should be sealed in its entirety.

Nothing herein is intended as a waiver of Defendants' right to contest Microsoft's designation of material as Confidential Business Information in accordance with the terms of the Protective Order. Defendants expressly reserve the right to do so as the circumstances warrant.

DATED this 27th day of June, 2012.

SUMMIT LAW GROUP PLLC

By /s/ Ralph H. Palumbo

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***Attorneys for Motorola Solutions, Inc., Motorola
Mobility, Inc., and General Instrument
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CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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DATED this 27th day of June, 2012.

/s/ Marcia A. Ripley

Marcia A. Ripley

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